

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:
vs.)	1:22-cv-04149-WMR
)	
FELICIA FRANKLIN, in her individual)	JURY TRIAL DEMANDED
and official capacities;)	
ALIEKA ANDERSON, in her individual)	
and official capacities;)	
GAIL HAMBRICK, in her individual)	
and official capacities; and)	
CLAYTON COUNTY, GEORGIA,)	
)	
)	
Defendants.)	

**PLAINTIFF’S CONSENT MOTION FOR AN EXTENSION OF TIME TO
RESPOND TO DEFENDANT FELICIA FRANKLIN’S
MOTION FOR JUDGMENT ON THE PLEADINGS**

COMES NOW, Plaintiff Ramona Thurman Bivins (“Ms. Bivins”), and moves this Court for an Order extending the time period for her response to the Motion for Judgment on the Pleadings filed by Defendant Felicia Franklin, in her individual and official capacities (“Defendant Franklin”) [ECF No. 29], through and including March 31, 2023, showing the Court as follows:

1. On October 17, 2022, Plaintiff filed her initial Complaint for Damages and Injunctive Relief against Defendants Felicia Franklin (“Franklin”), in her

individual and official capacities, Alieka Anderson (“Anderson”), in her individual and official capacities, Gail Hambrick (“Hambrick”), in her individual and official capacities, and Clayton County, Georgia (“Clayton County”). [ECF No. 1].

2. On December 5, 2022, Defendants Hambrick and Clayton County filed their Motion to Dismiss Plaintiff’s Complaint. [ECF No. 22].

3. Upon motion on December 5, 2022 by Defendants Hambrick and Clayton County to stay all discovery [ECF No. 23], the Court entered an Order [ECF No. 24] on December 5, 2022 staying all discovery in this matter pending the final resolution of Defendants’ Motion to Dismiss.

4. On December 12, 2022, Defendant Franklin filed her Answer to Plaintiff’s Complaint. [ECF No. 25].

5. On March 3, 2023, Defendant Franklin filed her Motion for Judgment on the Pleadings and Brief in Support Thereof. [ECF No. 44].

6. Plaintiff’s response to Defendant Franklin’s Motion for Judgment on the Pleadings is currently due on March 17, 2023.

7. A hearing before this Court is scheduled for May 22, 2023, at 9:30 a.m. regarding Hambrick’s and Clayton County’s motion to dismiss and Anderson’s and Franklin’s motions for judgment on the pleadings. [ECF No. 46].

8. In light of Plaintiff's counsel's numerous court deadlines in other matters, Plaintiff respectfully requests a fourteen (14) day extension of time to file her response to the Motion for Judgment on the Pleadings filed by Defendant Franklin through and including March 31, 2023.

9. Counsel for Plaintiff conferred with counsel for Defendant Franklin regarding the relief sought in this motion, and Counsel for Defendant Franklin consents to the relief sought in this motion.

10. The requested extension will not prejudice any party and is sought in good faith and not for the purposes of delay or any other purpose contrary to the Federal Rules of Civil Procedure and the Local Rules of this Court.

WHEREFORE, Plaintiff respectfully requests the Court grant her Motion for an Extension of Time to Respond to Defendant Franklin's Motion for Judgment on the Pleadings [ECF No. 44], extending the deadline to March 31, 2023.

A proposed Order is attached herewith.

Respectfully submitted this 16th day of March, 2023.

BUCKLEY BALA WILSON MEW LLP

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2023, I electronically filed the above **PLAINTIFF’S CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANT FELICIA FRANKLIN’S MOTION FOR JUDGMENT ON THE PLEADINGS** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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